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November 22, 2017

Via ECF/CM

The Honorable Edgardo Ramos  
United States District Court  
for the Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: *United States v. El Gammal*, 15-cr-588 (S.D.N.Y.) (ER)

Dear Judge Ramos:

I, along with Donald Duboulay, represent Mr. Ahmed El Gammal, having been appointed following his conviction at trial in January of this year. We write to ask for an extension of the deadlines for post-trial motions in this case.

Since our last correspondence with the Court, we have reviewed the case file and transcripts and have been endeavoring to focus the issues to be raised in post-trial motions, but several deadlines in other cases over the past month have interfered with our ability to do so effectively with our client. We therefore need some additional time to coordinate with our client and each other. Currently, post-trial defense motions are due on November 30, 2017. We ask that this Court grant a two-week adjournment, adjusting all current deadlines. This is the fourth such request for an adjournment since Mr. Duboulay and I were appointed by this Court. The government consents to the request.

Accordingly, we ask that this Court extend the current schedule for post-trial briefing by two weeks.

Respectfully submitted,

/s/ Megan W. Bennett

cc: All counsel of record via ECF/CM

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